

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

DATACELL EHF.,)	
)	
Plaintiff)	
v.)	Civil Action No. 1:14-cv-1658 (GBL-TCB)
)	
VISA INC., VISA EUROPE LTD., and)	
MASTERCARD INCORPORATED,)	
)	
Defendants)	

MASTERCARD INCORPORATED'S MOTION TO DISMISS THE COMPLAINT

Defendant, MasterCard Incorporated ("MasterCard"), by counsel, pursuant to Rules 12(b)(2), 12(b)(3), and 12(b)(6) of the Federal Rules of Civil Procedure, moves this Court to dismiss the complaint ("Motion to Dismiss") filed by the plaintiff DataCell ehf ("DataCell") for lack of personal jurisdiction, lack of proper venue, and failure to state a claim upon which the relief sought may be granted. The grounds and authorities in support of the Motion to Dismiss are set forth in MasterCard's Memorandum in Support of Motion to Dismiss the Complaint and supporting materials filed in connection with this motion. A proposed order granting the relief sought is attached as **Exhibit 1**.

Dated: May 8, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on May 8, 2015, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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